

PHILLIP A. TALBERT
United States Attorney
JEFFREY A. SPIVAK
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERMAN ANTONIO LOPEZ-VELASQUEZ,
MARKO ANTONIO LOPEZ, and
LISA MARIE SANTOS,

Defendants.

CASE NO. 1:22-CR-00208-JLT-SKO

JOINT STATUS REPORT AND STIPULATION
REGARDING EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT; ORDER

DATE: August 30, 2023

TIME: 1:00 p.m.

COURT: Hon. Sheila K. Oberto

This case is set for status conference August 30, 2023. As set forth below, the parties now move, by stipulation, to continue the status conference to November 15, 2023 and to exclude the time period between August 30, 2023 and November 15, 2023 under the Speedy Trial Act.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on August 30, 2023.
2. By this stipulation, defendant now moves to continue the status conference until November 15, 2023, and to exclude time between August 30, 2023 and November 15, 2023 under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the discovery associated with this case is
2 voluminous and includes many thousands of pages of documents, financial records, witness
3 interviews, investigative reports, and other evidence. This is a large scale financial fraud case.
4 All of this discovery has been either produced directly to counsel and/or made available for
5 inspection and copying.

6 b) Counsel for defendant desires additional time to consult with his/her client,
7 review the charges, conduct investigation and research, review discovery and discuss potential
8 resolution of the case. Since the last status conference, defense counsel has been extensively
9 researching issues relating to loss in the Sentencing Guidelines and discussing those issues with
10 government counsel. Such issues may materially affect sentencing.

11 c) Counsel for defendant believes that failure to grant the above-requested
12 continuance would deny him/her the reasonable time necessary for effective preparation, taking
13 into account the exercise of due diligence.

14 d) The government does not object to the continuance.

15 e) Based on the above-stated findings, the ends of justice served by continuing the
16 case as requested outweigh the interest of the public and the defendant in a trial within the
17 original date prescribed by the Speedy Trial Act.

18 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
19 et seq., within which trial must commence, the time period of August 30, 2023 to November 15,
20 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
21 T4] because it results from a continuance granted by the Court at defendant's request on the basis
22 of the Court's finding that the ends of justice served by taking such action outweigh the best
23 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 20, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ JEFFREY A. SPIVAK
JEFFREY A. SPIVAK
Assistant United States Attorney

Dated: August 20, 2023

/s/ Ryan Roth
Ryan Roth
Counsel for Defendant German Lopez

Dated: August 20, 2023

/s/ Scott Quinlan
W. Scott Quinlan
Counsel for Defendant Marko Lopez

Dated: August 20, 2023

/s/ Edward Robinson
Edward M. Robinson
Counsel for Defendant Lisa Santos

ORDER

The parties shall be prepared to select a mutually agreeable trial date at the next status conference.

IT IS SO ORDERED.

DATED: 8/25/2023

Sheila K. Oberto
THE HONORABLE SHEILA K. OBERTO
UNITED STATES DISTRICT JUDGE